

U.S. Department of Justice

Washington, DC 20530

Registration Statement**Pursuant to the Foreign Agents Registration Act of
1938, as amended****I--REGISTRANT**

1. Name of Registrant

Rubin Turnbull & Associates, Inc.

2. Registration Number (To be assigned by the FARA Unit)

6944

3. Primary Business Address

401 E Las Olas Blvd, Ste. 130-447, Ft. Lauderdale, FL 33301

4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

(b) Nationality

(c) Year of birth

(d) Present citizenship

(e) If present citizenship not acquired by birth, state when, where and how acquired

(f) Occupation

5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee ☐ Association ☐ Partnership ☐ Voluntary group ☐
Corporation ☒ Other (*specify*) _____

(b) Date and place of organization 05/21/1992, Florida

(c) Name of responsible individual William Rubin
(e.g., officer, director or partner)(d) Other business address(es), if any, including 815 Ponce de Leon Blvd., Ste. 201, Coral Gables, FL 33134
locations of branch or local offices 101 E College Ave, 5th Floor, Tallahassee, FL 32301

(e) If a membership organization, provide number of members

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
Heather Turnbull	4565 Grove Park Dr. Tallahassee, FL 32311	UNITED STATES	Managing Partner
William Rubin	10581 Grayhawk Street Plantation, FL 33324	UNITED STATES	Chairman

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services
See Appendix for Response		

(h) Describe the nature of the registrant's regular business or activity.

Governmental consulting

(i) Give a complete description of the ownership and control structure of the registrant.

The registrant is a corporation owned and controlled by William Rubin and Heather Turnbull.

6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
See Appendix for Response			

II--FOREIGN PRINCIPAL

7. List every foreign principal¹ for whom the registrant is acting or has agreed to act.

Foreign Principal

Embassy of the State of Qatar

Foreign Principal Address

2555 M St NW
Washington, DC 20037

III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes ☐

No ☒

If yes, describe fully.

Foreign Principal

Activities/Services

IV--FINANCIAL INFORMATION

9. (a) **RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register² under FARA, has the registrant received from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income, or money either as compensation, or for disbursement or otherwise?

Yes ☐

No ☒

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.³

Foreign Principal	Date Received	From Whom	Purpose	Amount
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¹ The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

² An agent must register within 10 days of becoming an agent, and before acting as such.

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

(b) RECEIPTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁴ under FARA, has the registrant received anything of value⁵ other than money, from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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10. (a) DISBURSEMENTS-MONIES

During the period beginning 60 days prior to the date of the registrant's obligation to register⁶ under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes ☐No ☒

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount
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(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁷ under FARA, has the registrant disposed of any thing of value⁸ other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During the period beginning 60 days prior to the date of the registrant's obligation to register⁹ under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☒ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate See Appendix for Response	Method	Amount/Thing of Value
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4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest-free loans, expense-free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

V--INFORMATIONAL MATERIALS¹⁰

11. Prior to the time of filing this statement,¹¹ has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes ☐ No ☒

If yes, identify each foreign principal and attach the informational materials.

Foreign Principal	Informational Materials Attached	Type
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12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes ☒ No ☐

- (b) If yes, identify each foreign principal and respond to the remaining items in this section.

Embassy of the State of Qatar

13. Has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes ☒ No ☐

If yes, furnish the names and addresses of such individuals or organizations.

Name	Address	Foreign Principal(s)
Christian Ulvert	1742 W Flagler St Miami, FL 33135	Embassy of the State of Qatar

15. Activities in preparing or disseminating informational materials will include the use of the following:

- ☐ Magazine or newspaper ☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications
☐ Lectures or speeches ☐ Radio or TV broadcasts ☐ Motion picture films ☐ Letters or telegrams
☒ Email
☐ Website URL(s): _____
☐ Social Media website URL(s): _____
☐ Other (specify) _____

¹⁰ The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, electronic communications, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

¹¹ See Footnote 2, on page 3.

<input checked="" type="checkbox"/> Public officials	<input type="checkbox"/> Civic groups or associations
<input checked="" type="checkbox"/> Legislators	<input type="checkbox"/> Libraries
<input checked="" type="checkbox"/> Government agencies	<input type="checkbox"/> Educational groups
<input checked="" type="checkbox"/> Newspapers	<input type="checkbox"/> Nationality groups
<input checked="" type="checkbox"/> Editors	<input type="checkbox"/> Other (<i>specify</i>)

☒ English ☒ Other (*specify*) To be determined

EXECUTION

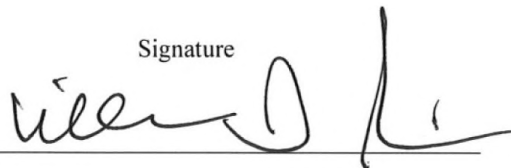
In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

4/1/2021 William D. Rubin



EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

4/1/2021 Heather L. Turnbull Heather L. Turnbull

Appendix

Response to Item 5(g)

Item 5(g): If the registrant is not an individual, furnish the following information: Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Person	Foreign Principal(s)	Services
Heather Turnbull	Embassy of the State of Qatar	Registrant has been engaged to provide advice and assistance to the Principal in government relations, public affairs, and communications in Florida to promote commercial, philanthropic, academic, cultural and other exchanges to advance the mutual interests of Florida and the State of Qatar.
William Rubin	Embassy of the State of Qatar	Registrant has been engaged to provide advice and assistance to the Principal in government relations, public affairs, and communications in Florida to promote commercial, philanthropic, academic, cultural and other exchanges to advance the mutual interests of Florida and the State of Qatar.

Appendix

Response to Item 6

Item 6: List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Nature of Services
Erica Chanti	1050 Brickell Ave Miami, FL 33131	Embassy of the State of Qatar	Registrant has been engaged to provide advice and assistance to the Principal in government relations, public affairs, and communications in Florida to promote commercial, philanthropic, academic, cultural and other exchanges to advance the mutual interests of Florida and the State of Qatar.
Jacqueline Carmona	1730 NE 139th Street North Miami, FL 33181	Embassy of the State of Qatar	Registrant has been engaged to provide advice and assistance to the Principal in government relations, public affairs, and communications in Florida to promote commercial, philanthropic, academic, cultural and other exchanges to advance the mutual interests of Florida and the State of Qatar.
Christian Ulvert	29 NE 102 St. Miami Shores, FL 33138	Embassy of the State of Qatar	Registrant has been engaged to provide advice and assistance to the Principal in public affairs and communications in Florida to promote commercial, philanthropic, academic, cultural and other exchanges to advance the mutual interests of Florida and the State of Qatar.
Jodi Bock Davidson	12204 NW 73rd St. Parkland, FL 33076	Embassy of the State of Qatar	Registrant has been engaged to provide advice and assistance to the Principal in government relations, public affairs, and communications in Florida to promote commercial, philanthropic, academic, cultural and other exchanges to advance the mutual interests of Florida and the State of Qatar.

Appendix

Response to Item 10(c)

Item 10(c): DISBURSEMENTS-POLITICAL CONTRIBUTIONS: During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method/Event	Amount/Thing of Value
03/05/2021	Christian Ulvert	Katia Saint Fleur for Miami Shores	Online	\$ 250.00
02/09/2021	Rubin Turnbull & Associates, Inc.	Linda Chaney Campaign	Online	\$ 1,000.00
01/25/2021	Rubin Turnbull & Associates, Inc.	Trey Caruso Campaign	Online	\$ 1,000.00
01/31/2021	Rubin Turnbull & Associates, Inc.	Rachel Plakon Campaign	Online	\$ 1,000.00
02/18/2021	Rubin Turnbull & Associates, Inc.	A Stronger Florida PAC	Online	\$ 25,000.00
03/01/2021	Rubin Turnbull & Associates, Inc.	Spencer Roach Campaign	Online	\$ 1,000.00
03/01/2021	Rubin Turnbull & Associates, Inc.	David Smith Campaign	Online	\$ 1,000.00
03/01/2021	Rubin Turnbull & Associates, Inc.	Randy Maggard Campaign	Online	\$ 1,000.00
03/01/2021	Rubin Turnbull & Associates, Inc.	Ana Maria Rodriguez Campaign	Online	\$ 1,000.00
03/01/2021	Rubin Turnbull & Associates, Inc.	Dan Daley Campaign	Online	\$ 1,000.00
03/13/2021	Rubin Turnbull & Associates, Inc.	Philip Griffitss Campaign	Online	\$ 1,000.00
03/15/2021	Rubin Turnbull & Associates, Inc.	Katia Saint Fleur for Miami Shores	Online	\$ 1,000.00
03/16/2021	Rubin Turnbull & Associates, Inc.	David Silvers Campaign	Online	\$ 1,000.00
03/26/2021	Rubin Turnbull & Associates, Inc.	Shane Abbott Campaign	Online	\$ 1,000.00
01/14/2021	Heather Turnbull	Tracy Caruso Campaign (Delray Beach)	Online	\$ 1,000.00
01/14/2021	Jodi Bock Davidson	Tracy Caruso Campaign (Delray Beach)	Online	\$ 500.00